

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

)	Chapter 11
In re:)	
)	Case No. 00-1982 (GMS)
GST TELECOM INC., <u>et al.</u>,)	
)	Jointly Administered
Debtors.)	
)	
)	
)	
<hr/>)	
GST TELECOM INC., <u>et al.</u>,)	
)	Civil Docket No. 04-CV-1380
Counterplaintiffs,)	
)	
v.)	
)	
JOHN WARTA,)	
)	
Counterdefendant.)	

AGREED MOTION FOR EXTENSION OF TIME

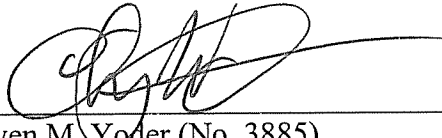
GST Telecom Inc. and the other debtors and debtors-in-possession in the above captioned cases (the “Debtors”) hereby move the Court for an extension of time to file their response to Claimant John Warta’s (“Warta”) motion for summary judgment. In support of their motion, which is unopposed by Warta, Debtors state as follows:

1. Pursuant to the Case Management Order signed by the Court on December 9, 2004 (the “Order”), the deadline for filing dispositive motions was March 15, 2005. The Order provided for the briefing on dispositive motions to occur pursuant to the Court’s Local Rules. Warta filed a motion for summary judgment on March 15, 2005. Under the Court’s Local Rules the Debtors have until March 29, 2005 to file their response.

2. The Debtors hereby seek a brief one-week extension of the deadline to file their response brief. Accordingly, the Debtors would have until April 5, 2005 to file their response to John Warta's Motion for Partial Summary Judgment Regarding Counts I-IV of GST's Amended Counterclaim. Warta does not oppose the present motion.

WHEREFORE, the Debtors request that its time to respond to Warta's motion be extended as set forth above.

Wilmington, Delaware
Date: March 28, 2005



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